

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ENVIGO RMS, LLC,

Defendant.

Case No. 6:22-00028-NKM

JOINT MOTION FOR EXTENSION OF TIME

The Court's June 27, 2022 Order extended the parties' deadline to submit a joint transfer plan to 5:00 pm on Wednesday, June 29, 2022. ECF No. 30. The parties respectfully move the Court for an additional extension of this deadline.

The parties are continuing to discuss the terms of a joint transfer plan. And, Envigo's motion for reconsideration of the Court's June 27, 2022 order clarifying its preliminary injunction order, ECF No. 31, and the United States' opposition to the motion for reconsideration, ECF No. 32, are pending before the Court. A ruling on this motion will affect the number of beagles that can be transferred from the Cumberland Facility by fulfilling existing contracts. Because the joint transfer plan depends in part on the number of beagles Envigo is permitted to transfer by fulfilling existing contracts, the parties respectfully request that the Court extend the parties' deadline to submit a joint transfer plan until 48 hours after the Court's resolution of the motion currently pending before the Court.

DATED: June 29, 2022

Respectfully Submitted,

CHRISTOPHER R. KAVANAUGH
United States Attorney

/s/ Anthony P. Giorno
ANTHONY P. GIORNO
First Assistant United States Attorney
Virginia Bar No. 15830

TODD KIM
Assistant Attorney General
Environment & Natural Resources Division

/s/ Mary Hollingsworth
MARY HOLLINGSWORTH
Senior Trial Attorney
Arizona Bar No. 027080
United States Department of Justice
Environment & Natural Resources Division
Wildlife & Marine Resources Section
999 18th Street, Rm. 370
Denver, CO 80202
Mary.hollingsworth@usdoj.gov
303-844-1898
SHAMPA A. PANDA
Trial Attorney
California Bar No. 316218
P.O. Box 7611, Ben Franklin Station
Washington, D.C. 20044-7611
Shampa.panda@usdoj.gov | 202-598-3799
Fax: 202-305-0275
Attorneys for the United States of America

/s/ Benjamin Razi
Benjamin Razi (D.C. Bar No. 475946)
(admitted *pro hac vice*)
Covington & Burling LLP
850 Tenth Street, NW
Washington, DC 20001
Telephone: (202) 662-5463
Fax: (202) 778-5463
brazi@cov.com

/s/ Brandon Michael Santos
John D. Adams (VSB No. 65203)
Brandon M. Santos (VSB No. 75380)
McGuireWoods LLP
Gateway Plaza 800
East Canal Street
Richmond, VA 23219
Telephone: (804) 775-4745
Facsimile: (804) 698-2194
jadams@mcguirewoods.com
bsantos@mcguirewoods.com

Counsel for Defendant Envigo RMS, LLC